

**NOTE: This report was adopted by the
full Environmental Quality Service Council**

**EQSC'S RISK-INTEGRATED
SYSTEM OF CLEANUPS (RISC)
SUBCOMMITTEE REPORT
November 12, 1998**

The second meeting of the RISC Subcommittee was held on October 29, 1998 at 10:00 a.m. Subcommittee members in attendance were Sen. Adams, Sen. Howard, Marv Gobles, William Goffinet, and Ginny Mahoney.

The Indiana Department of Environmental Management (IDEM) updated the Subcommittee on the current status of RISC development and agency plans leading up to implementation. Tom Linson, with the Office of Solid and Hazardous Waste Management, outlined plans for implementation, highlighting that the RISC Technical Manual will be reissued in late January 1999, with further improvements to occur over the balance of the year. Programmatic User Guides will be released in draft form concurrently with the Technical Manual, with training and implementation to follow. Bob Moran, with the Office of Emergency Response, highlighted main concerns expressed with the initial Technical Manual, presented some case study cost comparisons of RISC versus the Voluntary Remediation Program (VRP) and the leaking underground storage tank (LUST) program. He provided an overview of the anticipated impact of RISC on the VRP program. IDEM further offered that there had been meetings held with a few interested parties to obtain further input, but that a formal comment period was not planned.

Testimony from interested parties was then taken. From the testimony obtained, it is clear that RISC is a huge undertaking, and may be the largest IDEM undertaking never to have gone through rulemaking. However, the consensus of the parties present was that the process needs to continue to move forward, but with some safeguards and a structure that will allow improvement to occur.

Based on the study of this issue and the testimony of all parties, the RISC Subcommittee makes the following recommendations:

- A formal 90-day comment period should be established upon the issuance of the revised Technical Manual and draft User Guides.
- A longer transitional period should be considered for full implementation of RISC. IDEM has indicated a transitional period of three months, while other parties to this process believe a longer, more deliberate transitional period will allow greater flexibility and will assist IDEM in identifying areas of improvement to the RISC program.
- IDEM should identify outside interested parties to participate in its internal RISC groups in order to receive more diverse input.

- At the conclusion of the implementation of RISC, IDEM should provide a report to the EQSC regarding the successes and failures of RISC. This report should include the number of sites in each program area, the number of sites utilizing RISC versus historical programs, an assessment of the RISC program, and potential program improvements that would increase the confidence or cost-effectiveness of remedial cleanups within the state, or would otherwise increase the number of sites remediated.
- RISC should be consistent with Indiana statute.